

From: [McDonald, David](#)
To: [Casey, Carolyn](#)
Cc: [Wainberg, Daniel](#); [McDonald, David](#)
Subject: RE: Bruce Hoskins sent you a folder "Nov 13, 2018 Files" on Box - eco QAPP
Date: Wednesday, November 14, 2018 12:59:25 PM

I imagine (b) (5)

[REDACTED]

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From: Casey, Carolyn
Sent: Wednesday, November 14, 2018 10:42 AM
To: Bruce Hoskins ; craig@cummings.com

Cc: Wainberg, Daniel

Subject: RE: Bruce Hoskins sent you a folder "Nov 13, 2018 Files" on Box - eco QAPP

I just located the response to comments in another email. You mention a "benchmark comparison" in your response to the comment below. Please provide these benchmarks in form L.

Note that the Approved QAPP also did not include an ecological assessment work plan/QAPP.

Thank You

Carolyn

EPA Comment 14: Form L must contain the project action limits and the laboratory reporting limits. As discussed in detail during our May 8, 2018 meeting in Boston, the reporting limits must be less than the project action limits.

Response: *The proposed BERA report includes a weight of evidence evaluation, qualitative habitat impact assessment, benchmark comparisons, toxicity testing, and food chain modeling. Given these evaluative tools, strict "action limits" are not proposed. The lowest available laboratory reporting limits will be employed in the proposed benchmark comparisons, and these limits will be considered in assigning weight to such line of evidence.*

In addition, Form L of the approved September 2017 QAPP did not list project action limits. For certain media, MassDEP MCP Method 1 or air threshold values were included, but these were not considered to be project action limits. Actual project action limits cannot be established until the level of risk is determined.

From: Casey, Carolyn

Sent: Wednesday, November 14, 2018 10:29 AM

To: Bruce Hoskins <BHoskins@FslAssociates.com>; craig@cummings.com

Subject: FW: Bruce Hoskins sent you a folder "Nov 13, 2018 Files" on Box - eco QAPP

I do not see the project action limits (PALs) in this revised version. Am I missing something? Please refer to the comment on form L. I see that table 1 was added but these are the PALs from 2011 SLERA. They current PALs should be included in a table adjacent to the reporting limits for a quick comparison.

From: noreply@box.com <noreply@box.com>

Sent: Tuesday, November 13, 2018 4:21 PM

To: Casey, Carolyn <Casey.Carolyn@epa.gov>

Subject: Bruce Hoskins sent you a folder "Nov 13, 2018 Files" on Box

|



Bruce Hoskins (bruce.hoskins@comcast.net) has sent you a folder:



[Nov 13, 2018 Files](#)

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"I'd like to share my folder with you on Box. Cummings Beverly
QAPP Addendum Revision 1

- Bruce Hoskins"

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